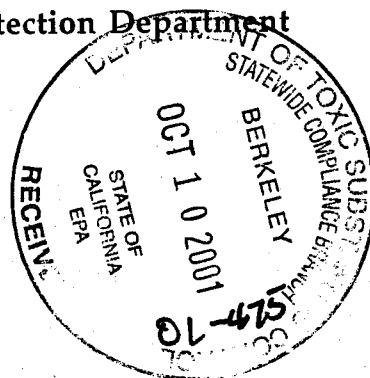




Lawrence Livermore National Laboratory

Environmental Protection Department
September 20, 2001

Mr. Michael R. James, Hazardous Substances Engineer
Statewide Compliance Division
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, CA 94710-2737



**SUBJECT: Response to the 2001 CEI Summary of Violations Report,
Livermore Site, Lawrence Livermore National Laboratory (LLNL)**

Dear Mr. James:

This letter is in response to the Department of Toxic Substances Control (DTSC) Summary of Violations (SOV) report, dated September 12, 2001, resulting from the Compliance Evaluation Inspection (CEI) conducted at LLNL June 20 through June 22, 2001. The SOV report cited three violations; 1) a minor violation related to storage of one lab-packed hazardous waste container (Q31383) for greater than 90 days at an unauthorized storage location, 2) a violation categorized as "other violation" related to labeling errors for 41 lab-packed containers, and 3) a violation categorized as "other violation" related to a single container (Q61837) which was assigned an incorrect TSDF start date in the computerized operating record (TWMS). As stated in LLNL's response submittal, which you received on 7/25/01 and mentioned in the 9/12/01 Summary of Violations report, all three violations were corrected.

In response to the unresolved issue mentioned in the SOV report concerning the second alleged violation and whether or not the operating record (TWMS) reflected the actual Workplace End Dates and TSDF Start Dates for the 41 containers, LLNL has determined that the operating records associated with only one of the 41 containers (Q62530) had incorrect Workplace End Date and/or TSDF Start Date information. The discrepant storage date information was corrected, however, at the time of discovery. More importantly, neither the TSDF nor the CWAA storage time limit was exceeded for Q62530.

The 9/12/2001 SOV report states that if LLNL's resolution determines that out of the 41 containers, less than six containers are in violation of 22 CCR, Section 66264.73 (b)(1), all of them will be classified as "minor" violations, including the third violation for container Q61837. Therefore, since only two data base errors (relating to lab pack storage time limits for containers Q62530 and Q61837) were found, LLNL is requesting that the DTSC consider the second and third alleged violations as "minor" violations.



Recycle
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Mr. Michael R. James, Hazardous Substances Engineer

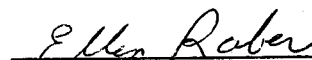
Statewide Compliance Division

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SUBJECT: Response to the 2001 CEI summary of Violations Report,
Livermore Site, Lawrence Livermore National Laboratory (LLNL)

Should you have any questions regarding this response, please contact me at
(925) 422-9642 or Kathy Pandrea-Raine of my staff at (925) 424-3321.

Sincerely,



Ellen Raber, Acting Department Head
Environmental Protection Department

ER/TTK/KPR:sj